



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

OCT 06 2015

**CERTIFIED MAIL 7009 1680 0000 7648 7665**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Greg Schneider  
Management Services Director  
Winnebago Mental Health Institute  
Wisconsin Resource Center  
1300 South Drive  
Winnebago, Wisconsin 54985

Re: Notice of Violation  
Compliance Evaluation Inspection  
WID 080 505 464

Dear Mr. Schneider:

On July 15, 2015 representatives of the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources inspected the Winnebago Mental Health Institution facility located in Winnebago, Wisconsin (WMHI). As a very small quantity generator of hazardous waste, WMHI is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate WMHI's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by WMHI, EPA's review of records pertaining to WMHI, and the inspector's observations, EPA has determined that WMHI has violated RCRA requirements related to hazardous waste generation, hazardous waste determination, marking containers of hazardous waste, annual report submission to WDNR for the year 2014, universal waste requirements, and used oil container labeling, as described below.

At the time of the inspection, WMHI violated the following very small quantity generator requirements:

1. Hazardous Waste Generation

Under WAC § NR 662.220(2) [40 C.F.R. § 261.5(c)], a very small quantity generator must include all hazardous waste that the generator generates, except hazardous waste that is: a) exempt; managed on-site in elementary neutralization units, b) wastewater treatment units or totally enclosed treatment facilities; c) recycled, without prior storage or accumulation; d) used oil; e) spent lead acid batteries; and f) universal waste. See, WAC § NR 662.220(2)(a) through (f) [40 C.F.R. § 261.5(c)].



At the time of the inspection, WMHI was accumulating hazardous waste in the Creamery Building, the on-site Pharmacy, and an on-site laboratory. At the time of the inspection, WMHI was generating used paint, used or outdated chemicals, used nicotine and used warfarin wrappers, and used sodium azide in containers. The last off-site shipment of hazardous waste utilizing a manifest was on April 25, 2014. The various hazardous wastes included: D001 (ignitable), D002 (corrosive), and F003 (spent non-halogenated solvents). WMHI utilizes Veolia ES Technical Solutions for off-site shipments of hazardous waste from the Creamery Building. WMHI also generates used nicotine patch wrappers (P075) and used warfarin (P001) wrappers on-site. At the time of the inspection, WMHI Pharmacy had accumulated eight one quart containers of P-listed waste. The WMHI Pharmacy sends this material off-site with other "combined hazardous pharmaceuticals" utilizing a Bill of Lading to Madison Environmental Resourcing, Inc., Madison, Wisconsin (MERI) (WID982211252) and then to Clean Harbors El Dorado, LLC, El Dorado, Arkansas (ARD069748192). An on-site laboratory generates used sodium azide (P105) in containers which are sent to the WMHI Pharmacy. Because a VSQG can only accumulate 1 kilogram (2.2 pounds) of "P" listed waste and never accumulate more than 1,000 kilograms (2,200 pounds) of hazardous waste, WMHI must keep track of hazardous waste quantities being generated on-site. Please provide the current generation rate per month of hazardous waste including "P" listed waste.

## 2. Hazardous Waste Determination

Under WAC § NR 662.220(5)(a), WAC § NR 662.220(6)(a) and WAC § NR 662.011 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in WAC § NR 661.02, must determine if that waste is a hazardous waste using certain methods: (1) determine if the waste is excluded from regulation; (2) determine if the waste is listed as a hazardous waste in Subchapter D of Chapter NR 661; (3) If the waste is not listed in Subchapter D, the generator must then determine whether the waste is identified in Subchapter C of Chapter NR 661; (a) Testing the waste according to the methods set forth in subchapter C of Chapter NR 661 or according to an equivalent method approved by WDNR under WAC § NR 660.21; (b) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used; (4) If the waste is determined to be hazardous, the generator must refer to Chapters NR 661, 664, 665, 666, 668, and 673 for possible exclusions or restrictions pertaining to management of the specific waste.

At the time of the inspection, WMHI had not made hazardous waste determinations on the paint shop spray booth filters and used spray gun soak solvent, waste selenium bearing shampoo, and the on-site laboratory sodium azide waste.



### 3. Mark Containers of Hazardous Waste

Under WAC § NR 662.220(5)(c)(2) and WAC § NR 662.220(6)(c)(2) the very small quantity must mark containers of acute and non-acutely hazardous waste with the words "Hazardous Waste".

At the time of the inspection, waste chemicals and waste paint in the Creamery Building were not marked "Hazardous Waste", two quart containers in the on-site pharmacy were not marked "Hazardous Waste" and the container of waste sodium azide was not marked in the on-site laboratory.

### 4. Annual Reporting

Under WAC § NR 662.193(3) a small quantity generator is subject to the annual reporting requirements in WAC § NR 662.041(1) and (2). Under WAC § NR 662.041(1) a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of an annual report to WDNR by March 1 of each year. The annual report must be submitted on WDNR forms and cover generator activities during the previous year.

At the time of the records review portion of the inspection, the WDNR manifest tracking report indicated that WMHI had shipped 2,678 pounds of hazardous waste off-site to Veolia ES Technical Solutions, LLC in 2014. WMHI should prepare and submit an annual report for the year 2014 to WDNR. See, WAC § NR 662.041(2).

### 5. Universal Waste Requirement

Under WAC § NR 673.13(4)(a) [40 CFR § 273.13(d)(1)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. The containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. Also, under WAC § NR 673.14(5) [40 CFR § 273.14(e)], each lamp or a container or package in which the lamps are contained must be labeled or marked clearly with the phrase "Universal Waste-Lamps", "Waste Lamps" or Used Lamps". Also, under WAC § NR 673.15(1) [40 CFR § 273.15(a)] a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of subparagraph (2) are met.

WMHI is a small quantity handler of universal waste because it does not accumulate more than 5,000 kilograms (11,025 pounds) of universal waste at any time. At the



time of the inspection, WMHI's containers of used lamps were not closed and were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps," and the last off-site shipment of used lamps was on July 1, 2013.

6. Used Oil Labeling Requirement

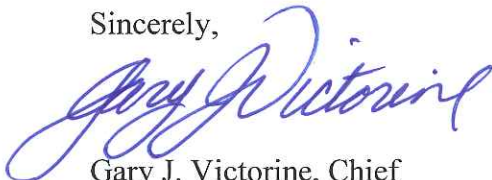
Under WAC § NR 679.22(3) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

During the inspection, the inspectors observed an unlabeled container of used oil in the Auto Shop, an unlabeled used oil collection device, and two unlabeled 55-gallon containers in the Boiler Plant, see photographs number 2, 4, and 20.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and universal waste requirements. You should submit your response to Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921 or at [francis.walt@epa.gov](mailto:francis.walt@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosures

cc: Jennifer Easterly, WDNR-Oshkosh Service Center  
([jennifer.easterly@wisconsin.gov](mailto:jennifer.easterly@wisconsin.gov))  
Michael Ellenbecker, WDNR-Sturtevant Service Center  
([michael.ellenbecker@wisconsin.gov](mailto:michael.ellenbecker@wisconsin.gov))





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: WINNEBAGO MENTAL HEALTH INSTITUTE  
FACILITY U.S. EPA ID NO.: WID 018 261 263  
FACILITY TYPE: Very Small Quantity Generator  
FACILITY ADDRESS: 1300 South Drive  
Winnebago, Wisconsin 54985  
U.S. EPA REPRESENTATIVE: Walt Francis  
DATE OF INSPECTION: July 15, 2015  
SIC CODE: 8063 – Psychiatric Hospitals  
NAICS CODE: 622210 – Psychiatric and Substance Abuse Hospitals

PREPARED BY: Walt Francis  
Walt Francis  
Environmental Scientist

8/17/2015  
Date

APPROVED BY: Julie Morris  
Julie Morris, Chief  
Compliance Section 2  
RCRA Branch

8/20/15  
Date



### **Purpose of Inspection**

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Winnebago Mental Health Institute (WMHI) located at 1300 South Drive, Winnebago, Wisconsin to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Wisconsin Administrative Code (WAC), with respect to WMHI's management of hazardous waste, universal waste and used oil.

### **Participants**

United States Environmental Protection Agency (U.S. EPA) Inspector -  
Walt Francis, Environmental Scientist

Wisconsin Department of Natural Resources (WDNR) Inspectors –  
Jennifer Easterly, Waste Management Specialist  
Dong-Son Pham, Waste Management Specialist

Representatives of WMHI -  
Greg Schneider, Management Services Director  
Dr. Thomas Speech, Director

### **Site Description/Background Information**

The State of Wisconsin Department of Health Services owns the Mendota Mental Health Institute, Madison, Wisconsin (MMHI) and the WMHI, Winnebago, Wisconsin. The WMHI is a psychiatric hospital operated by the Division of Mental Health and Substance Abuse Services. WMHI specializes in serving both male and female children, adolescents and adults with complex psychiatric conditions that are often combined with challenging behaviors. WMHI Forensic Services consist of four units: Petersik Hall North all male assessment and treatment unit with 29-beds; Petersik Hall South all female assessment and treatment unit with 29-beds; Choices is a 44-bed general psychiatric unit; and Gemini is a 22-bed coed treatment unit for patients with a dual diagnosis of mental illness and alcohol and other drug abuse issues. WMHI Civil Services include Sherman Hall North and South which consists of 40 coed patients and a Youth Services Unit which is a 34 bed gender specific unit. In addition, WMHI operates the Waterwood School. Waterwood School is a K-12 school serving the patients of WMHI. Youth who are admitted as patients and have an expectation of remaining in the hospital for a period of time are enrolled in the school. Also, the Wisconsin Resource Center (WRC) is just east of the WMHI and is operated by the State of Wisconsin Department of Health Services. The WRC has male inmates assigned to 20-34 bed units and women inmates are assigned three units with 10, 12, and 23 beds. The inmates are convicted felons who have been referred to WRC by the Wisconsin Department of Corrections for special mental health or behavioral treatment. Various waste materials from the WRC are brought to the WMHI Creamery Building for storage. WMHI originally submitted an EPA Form 8700-12 on December 21, 1987 as a Large Quantity



Generator. On June 18, 2001 WMHI changed their generator status to a Very Small Quantity Generator (VSQG). The WMHI facility currently has approximately 750 employees, operates 24 hours a day, 7 days per week. The WMHI facility was constructed in 1870 and occupies 120 acres.

At the time of the inspection, the WMHI facility was operating as a VSQG of hazardous waste. Historical hazardous waste streams have included: ignitable waste (D001); corrosive waste (D002); and spent non-halogenated solvents (F003), based on a WDNR Hazardous Waste Manifest Tracking Report. At the time of the inspection, the last off-site shipment of hazardous waste was on April 23, 2014. Other wastes include: 1) used oil; 2) used fluorescent lamps; 3) electronic waste; 4) used antifreeze; 5) used lead wheel weights; 6) laboratory waste; 7) pharmacy waste; and 8) used parts washer solution. Used parts washer solutions are picked up by Safety-Kleen. Used shop towels are placed in the trash. WDNR provided U.S. EPA with a copy of a "Hazardous Waste Manifest Records" report for the past few years for out-bound shipments of hazardous waste from the Winnebago, Wisconsin facility. The WDNR out-bound manifest report indicated that hazardous waste D001, D002, and F003 were shipped to Veolia ES Technical Solutions, LLC (WID003967148), Menomonee Falls, Wisconsin and Veolia ES Technical Solutions, LLC, Sauget, Illinois. The April 23, 2014 shipment consisted of 2,678 pounds of hazardous waste.

### **Opening Conference**

U.S. EPA representative Walt Francis and WDNR representatives Jennifer Easterly and Dong-Son Pham arrived at the WMHI facility at approximately 8:30 a.m. The inspectors introduced themselves to Mr. Greg Schneider, Management Services Director. Mr. Schneider took the inspectors to his office. Inspector Francis presented his credentials to Mr. Schneider, and informed him of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA and WDNR. Mr. Schneider provided the inspector with a brief overview of the facility, and provided information on the WRC. Mr. Schneider explained the various hazardous wastes generated by maintenance activities, at each nursing station and the pharmacy. Inspector Francis asked Mr. Schneider about used oil and universal waste. Mr. Schneider explained to the inspectors that used oil was picked up by Safety-Kleen and used fluorescent lamps were sent to Veolia ES Technical Solutions, Port Washington, Wisconsin.

Inspector Francis reviewed the most recent out-bound hazardous waste manifests records, and discussed the operation of the facility. Inspector Francis noted that the outbound tracking report indicated the last off-site shipment of D001, D002, and F003 was on April 23, 2014. WMHI did not make a CBI claim on the information gathered during the inspection. Mr. Schneider allowed the inspectors access to the facility to conduct the inspection.

### **Site Tour**

The walk-through began at the Welding Shop in the Maintenance Building (Building 212). Mr.



Schneider showed the inspectors a Safety-Kleen parts washer, see photograph number 16. Inspector Francis asked Mr. Schneider how the used solvent was handled. Mr. Schneider told the inspectors that Safety-Kleen comes in and changes out the solvent. The walk-through continued to the Wood Shop. Mr. Schneider introduced Mr. Jason Gassner, Craft Works Supervisor. Mr. Gassner showed the inspectors the Wood Shop. The walk-through continued to the Paint Shop. Mr. Gassner introduced Mr. Rick Jarzynka. Mr. Jarzynka showed the inspectors the paint mixing area and the spray booth area, see photograph number 1. Inspector Francis asked Mr. Jarzynka how the used spray booth filters, used aerosol cans and used rags were handled. Mr. Jarzynka told the inspectors that the spray booth filters, used aerosol cans, and used rags are placed in the general trash. Inspector Easterly asked Mr. Jarzynka about a spray gun soaking in a container of liquid. Mr. Jarzynka told the inspectors that when the solvent is no longer usable he takes it over to a container in the "Creamery Building". The walk-through continued to the Auto Shop, Building 1610. Mr. Gassner showed the inspectors several 55-gallon containers labeled "Used Oil", see photograph number 3. Inspector Francis asked Mr. Gassner about an unlabeled 55-gallon container, see photograph number 2. Mr. Gassner told the inspectors he was not sure. Mr. Gassner also showed the inspectors a container of used antifreeze, a container used for oil changes and a container of used lead wheel balancing weights, see photograph numbers 4 and 5. Inspector Francis observed another Safety-Kleen parts washer in the Auto Shop. Inspector Francis observed that it was labeled Safety-Kleen "Premium Gold Solvent". Mr. Gassner told the inspectors that Safety-Kleen comes in and changes out the used solvent. The walk-through continued to the Creamery, Building 607. Mr. Schneider showed the inspectors an area where discarded paints were accumulated, see photographs 6 through 8. The inspectors observed various 1-gallon and 5-gallon containers of paint. The walk-through continued to another area in the Creamery Building where Mr. Schneider showed the inspectors several boxes of universal waste fluorescent lamps, used batteries, several boxes of waste from the WRC, and some used electronic equipment, see photograph numbers 9 through 15. The walk-through continued to the Food Service, Building 8. Mr. Schneider introduced Mr. Paul Barfknecht, Pharmacist. Mr. Barfknecht showed the inspectors an area in the Pharmacy where medication waste was accumulated and an area where one quart containers of used nicotine patch packaging and used warfarin packaging were stored, see photograph number 17. Mr. Barfknecht told the inspectors that the 1-quart containers had come to the Pharmacy from WMHI various treatment unit medication rooms and from the WRC. Mr. Barfknecht told the inspectors that Madison Environmental Resourcing, Inc. (MERI), Madison, Wisconsin (WID982211252) was in the process of calculating their nicotine and warfarin "P" listed waste quantities. Mr. Barfknecht showed the inspectors an area in the pharmacy where items were accumulated for reverse distribution. Inspector Francis asked Mr. Barfknecht what company they utilized for pharmaceutical reverse distribution. Mr. Barfknecht told the inspectors they utilized EXP Pharmaceutical Services Corporation (EXP). Mr. Barfknecht showed the inspectors the pharmacy formulary. Inspector Francis asked Mr. Barfknecht if he had any records from EXP. Mr. Barfknecht told the inspectors the Pharmacy Director was Ms. Julie Thiel and she may have the records. The walk-through continued to a laboratory in Petersik Hall, room number L55. Mr. Schneider introduced Ms. Cheryl Hill. The inspectors asked Ms. Hill about waste generation from the laboratory. Ms. Hill told the inspectors that the immunoassay machine generates waste





bleach and water which is placed down the drain (see photograph number 19), in addition the laboratory generates waste sodium azide containers which are placed in a container to be transferred to the on-site Pharmacy, see photograph number 18. The inspectors asked Mr. Schneider to locate an MSDS sheet on the sodium azide containers. The walk-through continued to a Maintenance Room in Petersik Hall. Mr. Schneider introduced Mr. Mike Hilbert to the inspectors. Mr. Hilbert told the inspectors he did not have any waste containers. The walk-through continued to the "Red Bag" storage room. Mr. Schneider showed the inspectors the area where red medical waste bags are accumulated. The walk-through continued to Petersik Hall South. Mr. Barfknecht showed the inspectors a medication room in a ward which contained a 1-quart container for used nicotine wrappers and warfarin packaging, see photograph number 19. The walk-through continued to the Heating Plant, building number 207. Mr. Schneider introduced Mr. Steven Miller, Power Plant Operator in charge and Mr. Alan Lewis, Facilities Maintenance Specialist Advanced. Mr. Miller showed the inspectors the four boilers and two 55-gallon used oil containers in the basement area. Inspector Francis observed that the containers were not labeled "Used Oil", see photograph number 20. The inspection group then returned to Mr. Schneider's office.

### **Records Review**

Dr. Speech accompanied the inspectors and Mr. Schneider to his office. Inspector Francis provided Dr. Speech with a summary of the locations that were inspected. Inspector Francis asked Mr. Schneider for additional records such as waste determination, hazardous waste manifests, used oil and universal waste shipping papers, and pharmaceutical hazardous waste off-site manifests. Mr. Schneider told the inspectors that he would get the records together and send it out. Inspector Easterly told Mr. Schneider that for the year 2014, WMHI should have filed an annual hazardous waste report with WDNr.

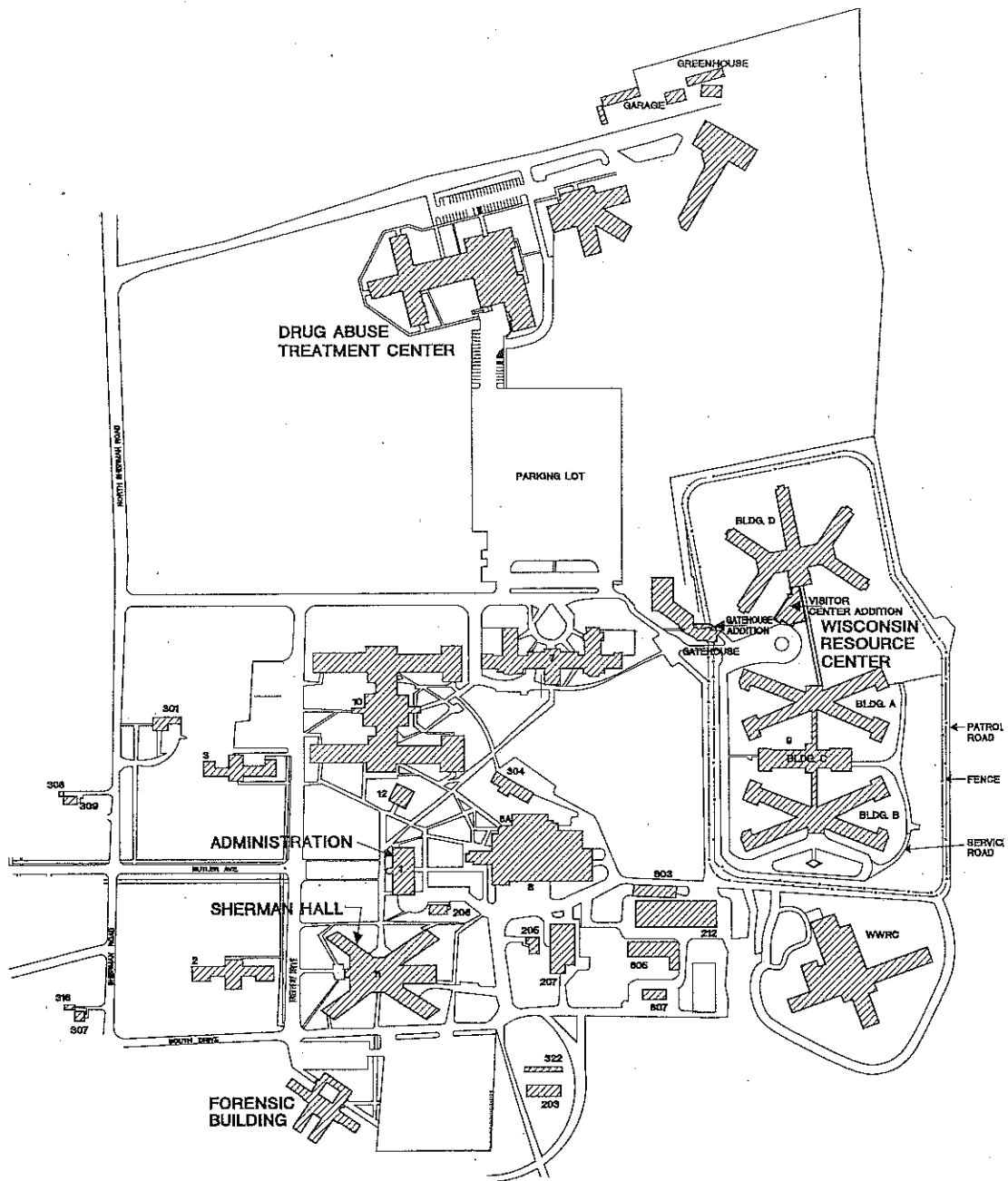
### **Closing Conference**

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. WMHI would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed the Creamery Building, Pharmacy, used oil labeling and universal waste labeling and container requirements. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a WDNr Used Oil Management publication, and a University of Wisconsin Extension Solid and Hazardous Waste Education Center Environmental Programs brochure to Mr. Schneider.

### **Attachments**

Inspection Checklists.  
Photographs.





BLD. NO.	BLD. NAME	CODE NO.
1	ADMINISTRATION	1101
2	SOUTH COTTAGE	1102
3	NORTH COTTAGE	1105
7	KEMPSTER HALL	1107
8	FOOD SERVICE	1108
8A	RECREATION BUILDING	1108A
9	THE WISCONSIN RESOURCE CENTER	1109
10	GORDON HALL	1110
11	SHERMAN HALL	1111
12	CHAPEL	1112
203	STORAGE #1	1203
205	CREDIT UNION	1205
206	STORAGE #2	1206
207	HEATING PLANT	1207
212	MAINTENANCE	1212
301	SUPERINTENDENT RESIDENCE	1301
304	NURSES HOME	1304
307	PHYSICIANS RESIDENCE #7	1307
308	RESIDENCE #2 GARAGE	1308
309	PHYSICIANS RESIDENCE #2	1309
316	RESIDENCE #7 GARAGE	1316
322	STEEL STORAGE #2	1322
603	ROOTHOUSE #1	1603
606	GREENHOUSE	1606
607	CREAMERY	1607
	FORENSIC BUILDING	

## WINNEBAGO MENTAL HEALTH INSTITUTION & WISCONSIN RESOURCE CENTER

Winnebago, Wisconsin

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# VERY SMALL QUANTITY GENERATOR INSPECTION - ACUTE

Revision: 02/12/2015  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

This Inspection Form Supplement, used in conjunction with the VERY SMALL QUANTITY GENERATOR INSPECTION REPORT, is for the inspection of facilities that generate less than 1 kg (2.2 lbs) of acute hazardous waste in a calendar month.

## Section 1: Waste Information

A. A hazardous waste determination has been made on each solid waste generated (NR 662.011). <i>Solvent Aqueous waste, waste nitrate, waste water</i> <i>Solvent, Hydrocarbons, Spent acids, etc.</i>	N	662.220(5)(a)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	N	662.220(5)(a)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1.). <i>VEOLIA, Merrimack, etc.</i>	Y	662.220(5)(a)
D. Waste is shipped to an approved or exempt facility. <i>HW - veolia + MARI, merrimack, etc.</i>	N	662.220(5)(e)

## Section 2: Manifest Requirements

A. Generator uses a manifest to ship hazardous waste. If NO, go to Section 3. <i>MARI - paperwork</i>	N	
B. Generator submitted a notification form and obtained an EPA identification number.	Y	662.220(5)(f)2
C. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)).	Y	662.220(5)(f)2
D. A facility that is permitted or licensed to accept the waste is designated on the manifest (NR 662.020(2)).	Y	662.220(5)(f)2
E. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	Y	662.220(5)(f)2
F. If the manifest copy signed by the receiving facility is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department (NR 662.193(2)).	Y	662.220(5)(f)3
G. Generator retains a copy of the manifest signed by the generator until the signed copy from the designated facility is received (NR 662.040(1)).	Y	662.220(5)(f)4
H. Copy of each manifest is kept for at least three years from the date of shipment (NR 662.040(1)).	Y	662.220(5)(f)4

## Section 3: On-Site Storage in Containers

A. Generator accumulates waste in containers. If NO, go to Section 4.	Y	
B. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	Y	662.220(5)(c)1
C. Containers are made or lined with materials compatible with the waste (NR 665.0172).	Y	662.220(5)(c)1



# VERY SMALL QUANTITY GENERATOR INSPECTION - ACUTE

Revision: 02/12/2015  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## Section 3: On-Site Storage in Containers

D. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.220(5)(c)1
E. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	Y	662.220(5)(c)1
F. Containers are marked with the words, "Hazardous Waste". <i>Waste Area, Waste Chemicals</i>	N	662.220(5)(c)2

## Section 4: Used Oil

A. Used oil is managed on-site. If NO, go to Section 5.	Y	
B. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2)
C. Used oil containers and tanks are marked "used oil". <i>Both Area + Garage</i>	N	679.22(3)(a)
D. Transporter has an EPA ID number, except when the generator self-transport or has a tolling agreement. <i>Safety-Klem - TXL 000 08/201</i> <i>Safety-Klem - Klem only, WI license W20985579439</i>	Y	679.24
E. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	Y	679.10(3)(a)
F. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
G. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

## Section 5: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 6.  Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y	
B. Universal waste has not been disposed, treated or diluted.  Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking. <i>Chemistry Bldg.</i>	N	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking. <i>Chemistry Bldg.</i>	N	673.13

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected  
Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question



Revision: 02/12/2015  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## VERY SMALL QUANTITY GENERATOR INSPECTION - ACUTE

### Section 5: Universal Waste

E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler. <i>Last shipped 2/1/2017</i>	N	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N	673.15(2)
H Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received. 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific <u>accumulation area</u> identified with the earliest date the waste was generated or received.	Y	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	Y	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	Y	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N	

### Section 6: Generator Status Evaluation

A. Less than 2.2 lbs. of acute hazardous waste is generated in any month.	Y	662.220(4)(a)
B. Less than 220 lbs. of residue from the cleanup of a spill of acute hazardous waste is generated in any month.	Y	662.220(4)(b)
C. Less than 2.2 lbs of acute hazardous waste is accumulated. <i>8 - 1 qt containers - sodium azide containers</i>	Unknown	662.220(5)(b)
D. Less than 220 lbs. of residue from the cleanup of a spill of acute hazardous waste is accumulated.	Y	662.220(5)(b)

E. Describe other hazardous waste activities the generator is conducting at the facility.  
*has waste +  
pharmaceutical waste +  
motor vehicle waste*



# VERY SMALL QUANTITY GENERATOR INSPECTION - ACUTE

Revision: 02/12/2015  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## Section 6: Generator Status Evaluation

F. Very small quantity generator status is confirmed by this inspection.

SAG 5/11/14 - 2014

?	

UNABLE TO  
CONFIRM





Photograph #1 – Maintenance Building Paint Shop, Spray Booth Filters



Photograph #2 – Auto Shop, Unlabeled 55-Gallon Container of Used Oil







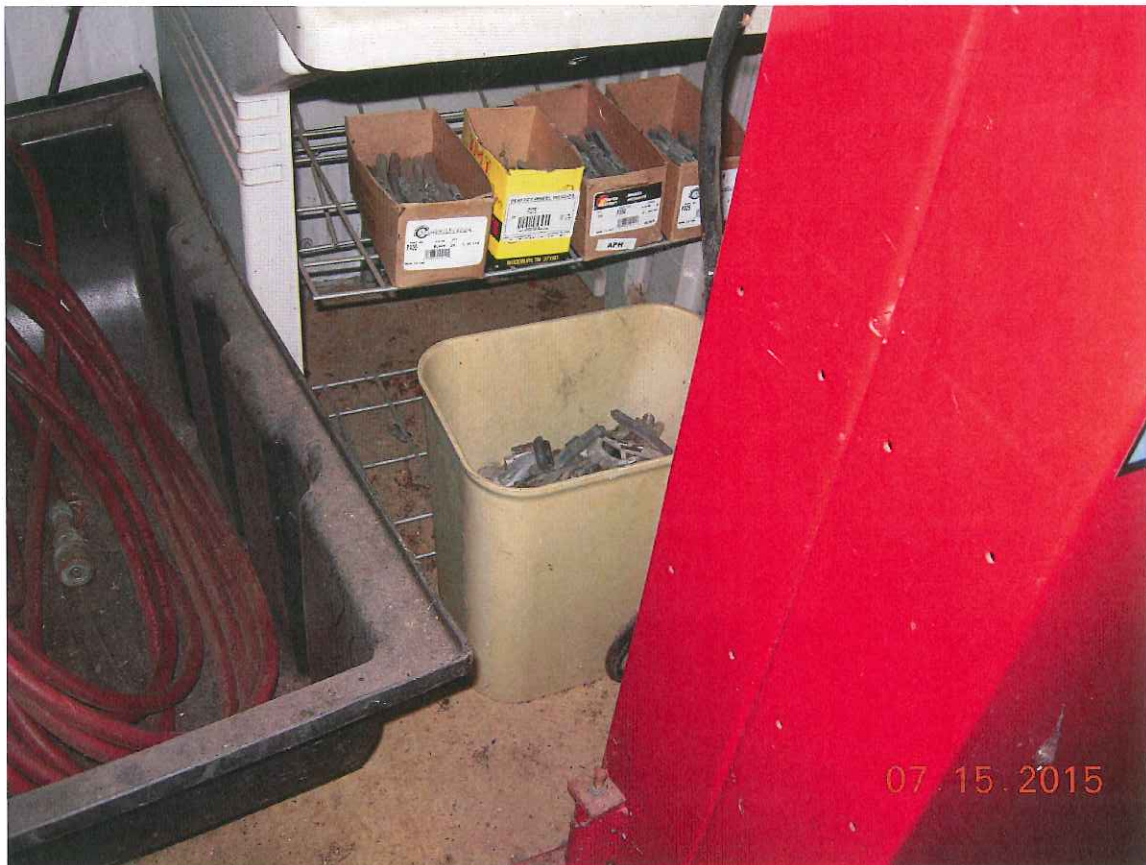
Photograph #3 – Auto Shop, 55-Gallon Containers of Used Oil



Photograph #4 – Auto Shop, Used Oil Collection Device and Used Antifreeze Container







Photograph #5 – Auto Shop, Container of Used Wheel Weights



Photograph #6 – Creamery Building, Used Paint Accumulation Area







Photograph #7 – Creamery Building, Used Paint Accumulation Area



Photograph #8 – Creamery Building, Used Paint Accumulation Area







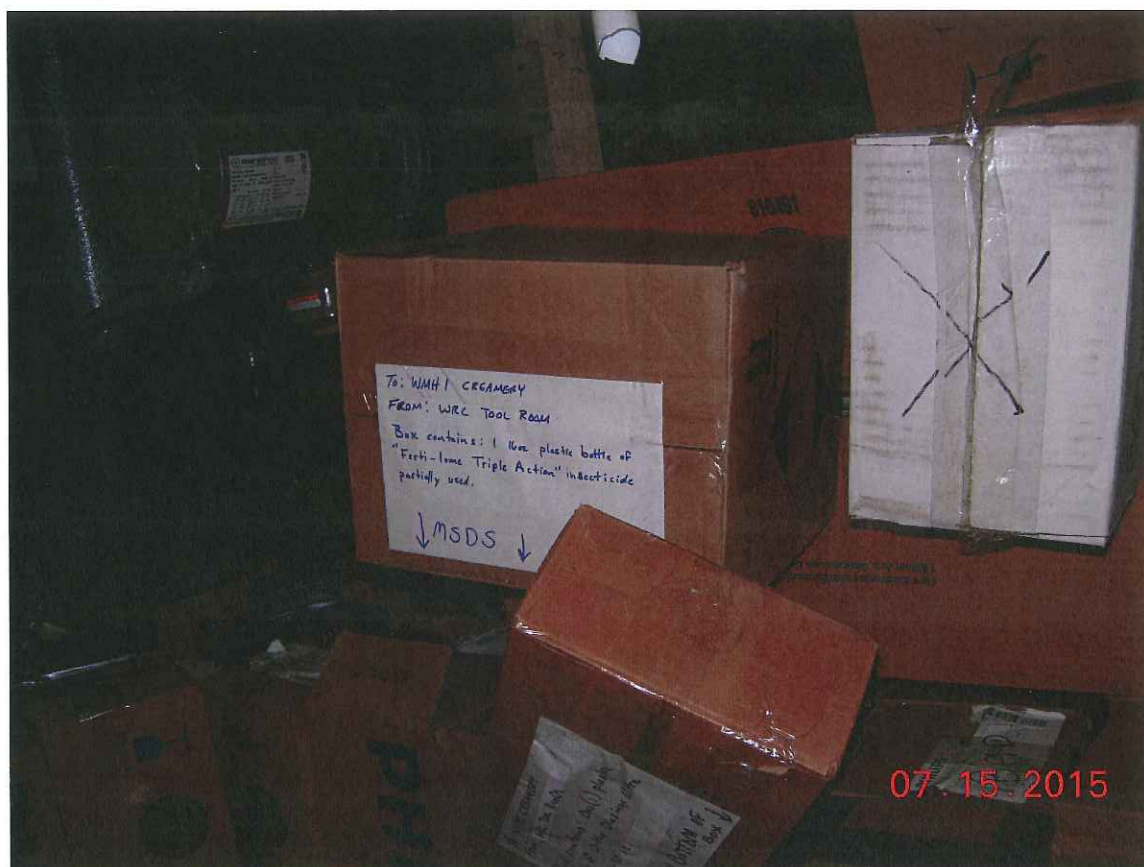
Photograph #9 – Creamery Building, Used UPS Battery Accumulation Area



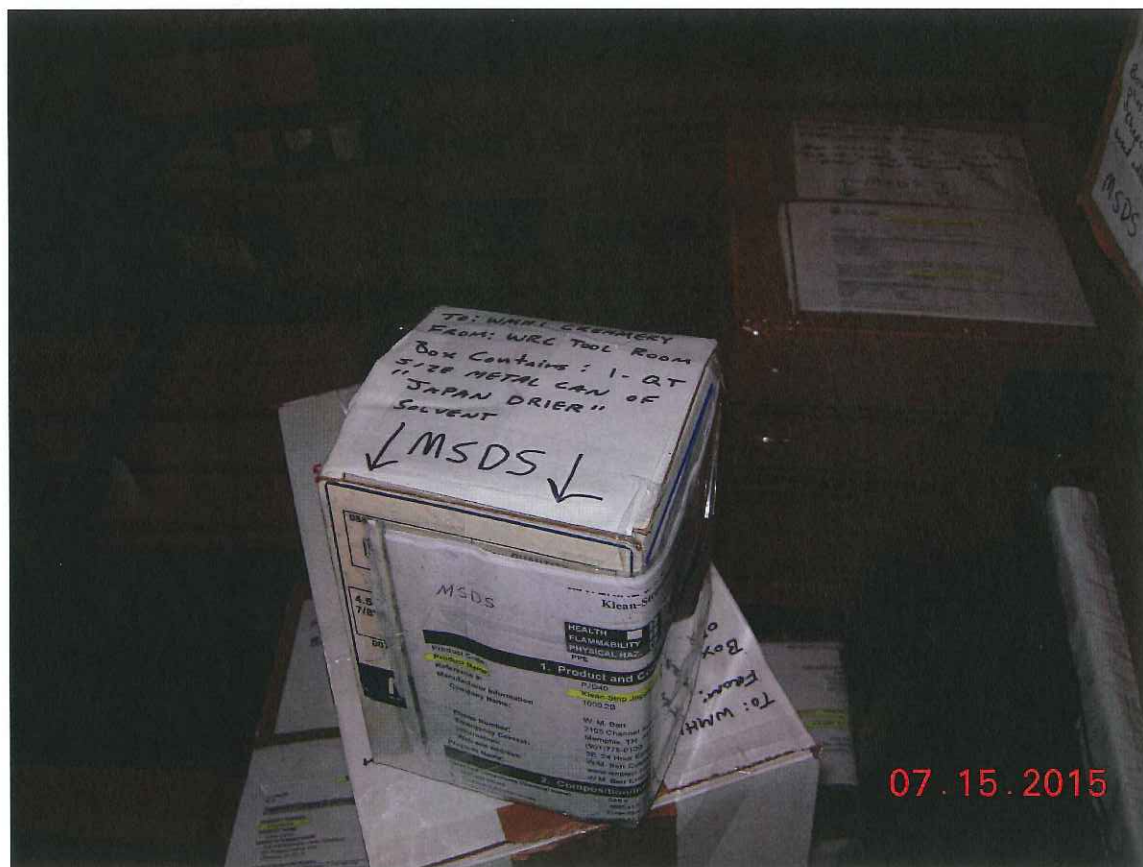
Photograph #10 – Creamery Building, Used Fluorescent Lamp Accumulation Area





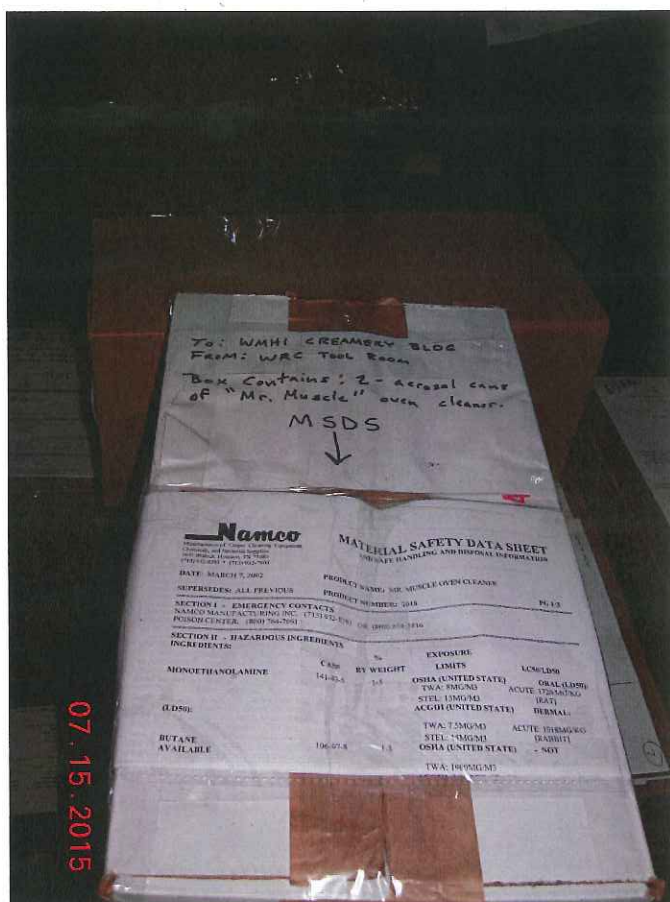


Photograph #11 – Creamery Building, Waste from WRC Tool Room



Photograph #12 – Creamery Building, Waste from WRC Tool Room





Photograph #13 – Creamery Building, Waste from WRC Tool Room



Photograph #14 – Creamery Building, Electronic Waste CRTs







Photograph #15 – Creamery Building, Universal Waste Lamp Accumulation Area



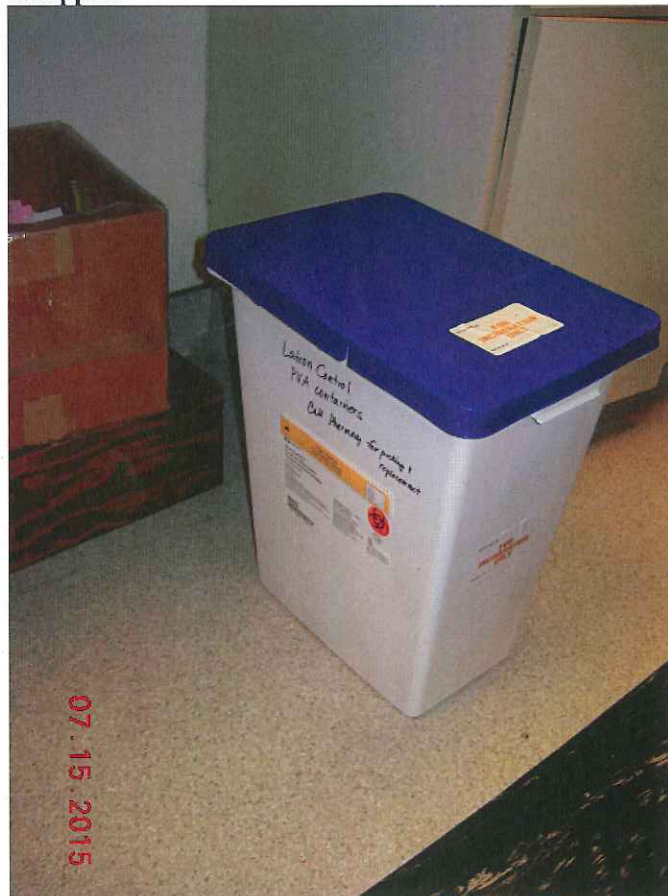
Photograph #16 – Maintenance Building Welding Shop, Safety-Kleen Parts Washer





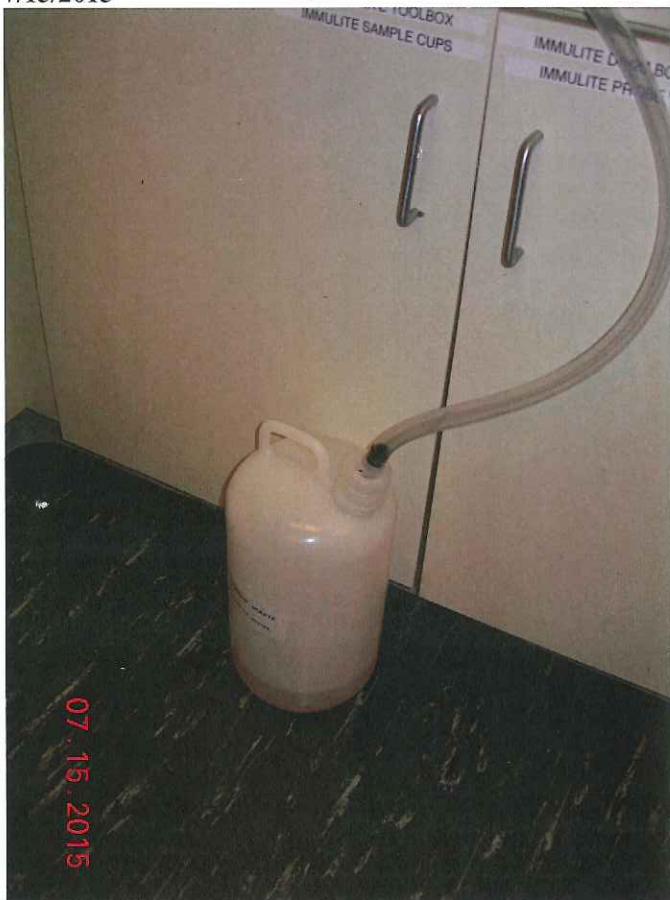


Photograph #17 – Service Building Pharmacy, 1-Quart Containers of Nicotine and Warfarin Wrappers



Photograph #18– Petersik Hall, Laboratory, Containers of Sodium Azide





Photograph #19– Petersik Hall, Laboratory, Container of Waste Bleach and Water



Photograph #19– Petersik Hall, Ward Medication Room, Container of Nicotine and Warfarin Packaging







Photograph #20 – Heating Plant, Basement Area, Two 55-Gallon Containers of Used Oil

